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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Chapter 11

Bankr. Case No. 19-30088 (DM)

(Jointly Administered)

**ORDER PURSUANT TO 11 U.S.C. §§
105(a), 107(b) AND 501 AND FED. R.
BANKR. P. 3001(a) AND 9018 FOR
ENTRY OF AN ORDER APPROVING
PROPOSED MODEL OMNIBUS
INSURANCE SUBROGATION PROOF
OF CLAIM FORM FOR
SUBROGATION CLAIMS AND
RELATED PROCEDURES**

1 Upon the Motion, dated May [], 2019 (the “**Motion**”) of the Ad Hoc Group of
2 Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”) pursuant to sections 105(a),
3 107(b) and 501 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rules
4 3001(a) and 9018 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for
5 entry of an order approving the proposed model Omnibus Insurance Subrogation Proof of Claim
6 Form for Subrogation Claims and related procedures and this Court having jurisdiction to
7 consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the
8 *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24
9 (N.D. Cal.), and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District
10 Court for the Northern District of California; and venue being proper before this Court pursuant
11 to 28 U.S.C. §§ 1408 and 1409; and the Court having found and determined that notice of the
12 Motion is reasonable and sufficient, and it appearing that no other or further notice needs to be
13 provided; and this Court having reviewed the Motion and accompanying memorandum of law;
14 and this Court having held a hearing on the Motion; and the Court having reviewed the
15 proposed Omnibus Insurance Subrogation Proof of Claim Form attached to the Motion as
16 Exhibit A (the “**Subrogation Group’s Form**”) and determined that it conforms substantially to
17 the appropriate Official Form; and this Court having determined that the legal and factual bases
18 set forth in the Motion and accompanying memorandum of law establish just cause for the relief
19 granted therein; and it appearing that the relief requested in the Motion is in the best interest of
20 the Debtors’ estates, creditors, shareholders, and all parties in interest; and upon all of the
21 proceedings had before this Court and after due deliberation and sufficient cause appearing
22 therefor,

23 **IT IS HEREBY ORDERED THAT:**

- 24 1. The Motion is granted as provided herein.
- 25 2. Capitalized terms used but not defined herein shall have the meanings
26 ascribed in the Motion.
- 27 3. The Subrogation Group’s Form is hereby approved. Each Subrogation
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1 Claim filed using the Subrogation Group's Form shall be deemed filed against each of the
2 Debtors.

3 4. To facilitate the use of the Subrogation Group's Form, the Court hereby
4 approves the following procedure: Prime Clerk will modify the website maintained for the
5 Debtors' chapter 11 cases located at <https://restructuring.primeclerk.com/pge/> so that (i) the
6 Subrogation Group's Form is publicly accessible, (ii) the webpage associated with the link
7 entitled "Submit a Claim" is modified so that potential Subrogation Claimants that choose to
8 file a proof of claim form for Subrogation Claims are directed to, and can, complete the
9 Subrogation Group's Form, and (iii) the supporting information submitted in connection with
10 the Subrogation Group's Form is maintained in a confidential manner.

11 5. The supporting information submitted in connection with the Subrogation
12 Group's Form shall be sealed, remain confidential in these chapter 11 cases, and not become
13 part of the public record. Copies of such information may be provided to: (a) the Court, the
14 Debtors, and the Office of the United States Trustee; and (b) counsel for any official committees
15 in these cases on a professional eyes' only basis.

16 6. Nothing contained in this Order or in the Motion is intended to be or shall
17 be construed as (a) an admission as to the validity of any claim against the Debtors, (b) a waiver
18 of the Debtors' or any appropriate party in interest's rights to dispute any claim, or
19 (c) establishing a bar date for filing proofs of claim in the chapter 11 cases.

20 7. The use of the term "subrogation" herein is not intended to modify or limit
21 the substantive rights of the holder of claims or the basis for any claimant's right to assert
22 claims originating with insured tort victims.

23 8. The Ad Hoc Subrogation Group, the Debtors, and Prime Clerk are each
24 authorized to take all steps necessary or appropriate to carry out this Order.

1 9. This Court shall retain jurisdiction to hear and determine all matters
2 arising from or related to the implementation, interpretation, or enforcement of this Order.

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4 ** END OF ORDER **
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